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October 10, 2007

Chip Humphrey
Eric Blischke
U.S. Environmental Protection Agency, Region 10
811 SW 6th Avenue, 3rd Floor
Portland, OR 97204

Re: Lower Willamette River, Portland Harbor Superfund Site
USEPA Docket No: CERCLA-10-2001-0240
Transmittal of Round 3B Gunderson Area 1 Groundwater Pathway Field Sampling Plan

Dear Msrs. Humphrey and Blischke:

This letter transmits the revised Round 3B Gunderson Area 1 Groundwater Pathway Field Sampling Plan (FSP) for the Portland Harbor RI/FS. The FSP details the methods to be used in the collection and processing of stratigraphic cores and contingent transition zone water samples offshore of Gunderson Area 1. This revised FSP reflects the resolution of EPA comments (dated September 20, 2007) on the draft FSP (dated August 17, 2007), as reached on the conference call on October 4, 2007. The data set produced by implementation of this FSP will supplement the Round 2 Groundwater Pathway Assessment data and represents the anticipated final groundwater pathway data collection effort to be conducted at Gunderson Area 1 as part of the RI/FS.

The Portland Harbor RI/FS Comprehensive Round 2 Site Characterization Summary and Data Gaps Analysis Report completed in February 2007 summarized the site data collected to date and presented an evaluation of the data needed to complete the RI/FS. While the Round 2 Report identified several Round 3 data needs, it did not identify additional RI/FS data needs for the groundwater pathway offshore of Gunderson Area 1. In its June 8, 2007 letter to the LWG, the U.S. Environmental Protection Agency (EPA) Region 10 reached a different conclusion. Based on subsequent meetings and correspondence (see EPA Round 3 Data Gap Summary table, email communication from E. Blischke, June 28, 2007), the LWG understands EPA's desire to focus on further evaluation of a possible preferential flow zone for discharge of a deep chlorinated solvent plume that is beyond the limits of the Round 2 GWPA investigation at Gunderson Area 1.

Oregon Department of Environmental Quality (ODEQ) has indicated (personal communication from M. McClincy at June 27 meeting) that it believes the upland groundwater extraction system at the Gunderson site is effectively intercepting the volatile organic compound (VOC) groundwater plume in both the shallow and deep portions of the aquifer. ODEQ also expressed (email communication from M. McClincy to E. Blischke, June 22, 2007) that it is likely to be comfortable with a remedial approach of a presumed natural attenuation for the deeper portion of the plume. During the October 4, 2007 conference call, however, ODEQ (Dana Bayuk) made it clear that these are preliminary statements, and that an approved final remedy is not yet finalized for this site. It is not clear how a search for a possible expression of VOCs from this deeper plume in the navigational channel will affect future remedy decisions.

While LWG stands by its prior conclusion that additional investigation in this area is not necessary to complete the RI/FS, we recognize that collecting additional data offshore of Gunderson Area 1 may be the most expedient path toward the common goal of completing the RI/FS in a timely manner. We also appreciate EPA and ODEQ efforts to reach a technical resolution to EPA comments on the draft FSP in a

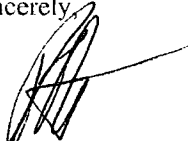
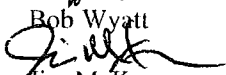
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timely manner. Consequently, the FSP attached here is designed to close the EPA-identified data gap, in accordance with the verbal agreements reached on October 4, 2007, and to allow the larger RI/FS program to move forward as scheduled.

Sincerely,


Bob Wyatt

Jim McKenna

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